



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 21 2010

Colonel Alvin B. Lee
New Orleans District
U.S. Army Corps of Engineers
P.O. Box 60267
New Orleans, LA 70160-0267

Dear Colonel Lee:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) Region 6 has reviewed the Corps of Engineers (Corps) May 2010, Draft Supplemental Environmental Impact Statement (DSEIS) for the Louisiana Coastal Area (LCA) Terrebonne Basin Barrier Shoreline Restoration project, Terrebonne Parish, Louisiana. With this letter and enclosed Detailed Comments, EPA offers our rating and comments on this DSEIS.

As we have previously stated, EPA supports the LCA program and remains committed to working with the Corps of Engineers (Corps) and our other partners to help ensure expedited implementation of specific LCA restoration projects. We strongly support measures to restore Louisiana's barrier islands, including the Corps recommended project (i.e., "Whiskey Plan C"). EPA rates the subject DSEIS as "LO" ie. Lack of Objections.

EPA appreciates the opportunity to review the DSEIS's. If you have any questions about the 309 Review Process, please contact Michael Jansky of my staff at (214) 665-7451 or by e-mail at jansky.michael@epa.gov. If you questions or wish to discuss the technical aspects of our comments, contact John Ettinger at (504) 862-1119. Please send our office two copies of the Final SEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460.

Sincerely yours,

Cathy Gilmore, Chief
Office of Planning
and Coordination 6ENXP

Enclosure

**DETAILED COMMENTS
ON THE
NEW ORLEANS DISTRICT
US ARMY CORPS OF ENGINEERS
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE
TERREBONE BASIN BARRIER SHORELINE RESTORATION**

COMMENT

EPA concurs with the Corps decision in this case not to use rocks or other hard structures as part of the proposed Whiskey Island restoration project. Coastal restoration is most effective when it mimics natural structures and processes. Rocks and other hard structures are artificial measures, which are not in any way consistent with the natural structure and processes associated with Louisiana's barrier islands. As acknowledged in the subject DSEIS, the use of rocks and other hard structures can result in adverse impacts, including increased erosion and disruption of sediment processes. Conversely, measures which focus on restoring sediments to barrier islands have the potential to prolong the existence of such islands, while allowing for natural shifting and island reformation in response to storms. EPA also concurs with the Corps' assessment that Whiskey Plan C could complement Coastal Wetlands Planning, Protection and Restoration Act barrier island restoration work completed on Whiskey Island.

The LCA program in general and this barrier island project in particular represent critical near-term restoration measures. These efforts should not, however, be mistaken for the larger and more comprehensive effort needed to address coastal wetland loss in Louisiana on the scale and scope warranted. The ongoing oil spill in the Gulf of Mexico and its impacts on Louisiana's valuable coastal wetlands and aquatic resources only underscore this point. Nevertheless, this and other LCA projects can be viewed as stepping stones towards larger and more aggressive projects, and offer valuable learning and adaptive management opportunities that will help in that regard.

The study area for this project appears to have been impacted by the BP oil spill. At this point, it is unclear whether and to what extent any such oil impacts would affect implementation of the proposed project. Moving forward, the Corps should be prepared to assess, when necessary, whether oil remains in the project area and, if so, whether any project modifications or additional environmental analysis would be warranted. The proposed project is designed to stay within an authorized funding cap. Should funding beyond the authorized limit become available (e.g., in association with the oil spill), we would recommend the Corps revisit the alternatives analysis for this project to more rigorously evaluate and compare options that more comprehensively address barrier island restoration needs in Terrebonne Basin.

We would again point out the connection between the ongoing LCA effort to develop near-term restoration projects and the interagency effort to prioritize and expedite coastal restoration projects pursuant to the March 2010, Roadmap for Restoring

Ecosystem Resiliency and Sustainability (Roadmap). The interagency process initiated by the Roadmap provides a valuable opportunity to identify the most promising LCA projects and focus limited resources to ensure that such projects are constructed in a timely fashion.

Finally, please note that schedule and resource constraints have affected EPA's ability to fully engage in the interagency development and review of this LCA project. We greatly respect the views of our state and Federal partner agencies with responsibilities and expertise pertaining to fish and wildlife impacts. We would defer to some extent to the recommendations of the U.S. Fish and Wildlife Service, National

Marine Fisheries Service, and Louisiana Department of Wildlife and Fisheries on any additional information and analysis needed for resources within their purview. We would encourage the Corps to fully address any such needs identified by these agencies.

Thanks again for your continued collaboration with EPA on this important effort. We look forward to working with you and your staff on the ongoing effort to further these and other components of the LCA program. If you have any questions or wish to discuss this matter further, please contact John Ettinger at (504) 862-1119.